

1 J Christopher Jorgensen
Nevada Bar No. 5382
2 LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
3 Las Vegas, NV 89169
Phone: (702) 949-8200
4 Email: cjorgensen@lrrc.com

5 *Attorney for Defendant Barclays Bank Delaware*

6
7 **IN THE UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 Zakari Perry,

10 Plaintiff,

11 vs.

12 Trans Union LLC, *et al.*,

13 Defendants.
14

Case No. 2:20-cv-01500-APG-NJK

**SECOND JOINT MOTION AND ORDER
TO EXTEND DEFENDANT BARCLAYS
BANK DELAWARE'S TIME TO RESPOND
TO COMPLAINT**

15
16 COME NOW Plaintiff Zakari Perry ("Plaintiff") and Defendant Barclays Bank Delaware
17 ("Barclays," together with Plaintiff, the "Parties") by counsel and pursuant to Local Rule IA 6-1,
18 jointly move for an extension as follows:

19 **STATEMENT OF JOINT MOTION**

- 20 1. On August 12, 2020, Plaintiff filed a Complaint with this Court [ECF No. 1].
21 2. Barclays was served with the Complaint on or about August 17, 2020.
22 3. Barclays' response to the Complaint was due by September 8, 2020. *See* Fed. R. Civ.
23 P. 12(a)(1)(A)(i).
24 4. On September 3, 2020 the Court granted Barclays' first motion for extension of time
25 to respond to Plaintiff's Complaint, through September 28, 2020. [ECF No. 7].
26 5. Barclays now respectfully requests and additional twenty-one (21) day extension of
27 time, through October 19, 2020, to respond to Plaintiff's Complaint.
28

1 6. The Court may extend a response date either on its own or upon a request made before
2 the time to act has expired. *See* Fed. R. Civ. P. 6(b)(1)(A). Accordingly, this Joint Motion is timely as
3 September 28, 2020 is the date upon which Barclays is currently required to respond to the Complaint.

4 7. Further, good cause exists as to the Parties' requested extension. Barclays requires
5 additional time to investigate Plaintiff's claims and to prepare its response. Moreover, the parties are
6 still engaged in preliminary discussions in this matter, and Barclays is in the process of providing
7 counsel for Plaintiff with documentation that may lead to an early resolution. To preserve this Court's
8 valuable time and resources, and in the interest of judicial economy, the Parties respectfully request a
9 twenty (21) day extension of time for Barclays to respond to the Complaint, through and including
10 October 19, 2020.

11 8. Counsel for Barclays conferred with counsel for Plaintiff regarding this extension and
12 Joint Motion. Counsel for Plaintiff agrees to the requested extension.

13 9. This Joint Motion is filed in good faith and not for dilatory or other improper purpose.
14 Plaintiff would not suffer any prejudice by the Court permitting Barclays the requested extension of
15 time and has consented to the requested extension.

16 ...

17 ...

18 ...

19 ...

20 ...

21 ...

22

23

24

25

26

27

28

10. This is the second request for extension of time for Barclays to respond to the Complaint.

DATED: September 23, 2020.

DATED: September 23, 2020.

/s/ J. Christopher Jorgensen

/s/ Michael Kind

J Christopher Jorgensen (NV Bar #5382)
Lewis Roca Rothgerber Christie LLP
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169

Michael Kind, Esq. (NV Bar No. 13903)
Kind Law
8860 South Maryland Parkway, Suite 106
Las Vegas, NV 89123

*Attorney for Defendant Barclays Bank
Delaware*

Attorney for Plaintiff

IT IS SO ORDERED

ORDER

**NO FURTHER EXTENSIONS
WILL BE GRANTED.**


UNITED STATES MAGISTRATE JUDGE

DATED: September 24, 2020

Respectfully submitted

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ J. Christopher Jorgensen

J Christopher Jorgensen (NV Bar #5382)
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169

Attorney for Defendant Barclays Bank Delaware